



**Muriel Goode-Trufant**  
*Corporation Counsel*

**THE CITY OF NEW YORK**  
**LAW DEPARTMENT**  
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February 21, 2025

**BY ECF**

Honorable Denise L. Cote  
United States District Judge  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007-1312

Re: Willow Friedland, et al. v. The City of New York, et. al.,  
24-CV-102429 (DLC)

Your Honor:

I am a Senior Counsel in the Office of Muriel Goode-Trufant, Corporation Counsel of the City of New York, representing defendants City of New York (“the City”), Former Mayor Bill De Blasio, Former New York City Police Department Commissioner Dermot Shea, and Former New York City Police Department Chief of Department Terence Monahan (hereinafter “defendants”) in the above referenced matter. In that capacity, I write with the consent of plaintiffs’ counsel, Wylie M. Stecklow, Esq., to respectfully request a thirty-one day enlargement of time February 28, 2025 to and including March 31, 2025 within which defendants may answer or otherwise respond to the First Amended Complaint. This is the second request for an enlargement of time.

An enlargement of time will allow this Office time to receive necessary records from the appropriate agencies. In order to respond to the allegations contained in the complaint, defendant City must obtain records of the underlying criminal case including police documents and documents from the Criminal Court and District Attorney’s files. It is our understanding that these records are sealed pursuant to New York Criminal Procedure Law § 160.50. Defendant City has received some, but not all, of the requested documents, and without the records, defendant City cannot properly assess this case or respond to the complaint. Accordingly, defendant City requires this enlargement so that this Office may obtain the underlying documentation, properly investigate the allegations of the complaint and fulfill our obligations under Rule 11 of the Federal Rules of

Civil Procedure. Additionally, the undersigned will be out of the office on medical leave until March 17, 2025.<sup>1</sup>

In view of the foregoing, defendants respectfully requests a thirty-one day enlargement of time February 28, 2025 to and including March 31, 2025. Thank you for your consideration herein.

Respectfully submitted,

/s/ *Yini Zhang*

Yini Zhang

Senior Counsel

Special Federal Litigation Division

cc: Counsels of Record (By ECF)

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<sup>1</sup> The undersigned can provide additional details about the medical leave on an *ex parte* basis should the Court require it.